



# **The Commonwealth of Massachusetts**

---

## **DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

**BAY STATE GAS COMPANY**  
D.T.E. 06-36

### **THIRD SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BAY STATE GAS COMPANY**

---

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Bay State" or "Company") the following Information Requests:

#### **INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
2. Answers are due September 1, 2006.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Local or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit, one (1) copy of the responses each to: Julie Howley Westwater, Legal Division; Cynthia Bradbury, Gas Division; Rebecca Hanson, Gas Division; Alexander Kofitse, Gas Division; and Andreas Thanos, Gas Division.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us), and to the e-mail service list.

### INFORMATION REQUESTS

- DTE 3-1 Refer to the Company’s response to DTE 1-4. In particular, refer to items (c) the monetary penalty assessed for each overtake including the date the penalty was assessed; and (d) the date on which the penalty was paid by the customer. Recognizing that penalties are paid by marketers, please provide the answers to these question. Provide a representative example of how a penalty is shown on the customer or marketer invoice. If the Company does not possess information to respond to these questions, indicate so, and provide the reasons for not having the information.
- DTE 3-1 Refer to the Company’s response to DTE 1-4. In particular, refer to the following language: “...overtakes are at a pool level and assignment of responsibility to an individual customer is not possible.” Based on this response, please explain Bay State’s contention that grandfathered customers may put Bay State’s distribution customers at risk.

- DTE 3-3      Refer to the Company's response to DTE 1-4. Provide a representative example of the mechanics of how penalty dollars are credited to firm sales customers through the application of the Cost of Gas Adjustment Clause ("CGAC" proceeding. Provide the actual paperwork for the example, highlighting the crediting of penalty dollars.
- DTE 3-4      Refer to the Company's response to DTE 2-8. Provide the date each customer became a grandfathered customer.
- DTE 3-5      Provide a cost estimate for real time metering for Bay State's 22 largest grandfathered customers. Confirm Mr. Ferro's testimony that indicates that these 22 customers represent 30 percent of Bay State's total grandfathered MDQs.
- DTE 3-6      Could Bay State modify its Terms and Conditions to implement curtailment prior to intraday nomination deadlines on critical days? Has the Company evaluated this option? Explain why or why not.
- DTE 3-7      Calculate a reserve comparing the absolute value of imbalance specific to grandfathered customers compared to the design MDQs of the grandfathered pool.
- DTE 3-8      Calculate the Customer Reliability Charge assuming a reserve of: (a) ten percent , (b) one percent , and (c) the calculation amount from DTE 3-7, above. In addition for each of these three amounts, calculate the Charge assuming the Charge is spread over all customers, not just grandfathered customers. Indicate whether Bay State would agree that the proceeding would have to be re-noticed if the Charge were to be assessed on all customers, not just grandfathered.

Dated:          August 22, 2006